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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 DFSB KOLLECTIVE CO. LTD., a
17 Korean corporation,

18 Plaintiff,

19 vs.
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21 CJ E&M, INC., a Korean corporation;
22 CJ E&M AMERICA, INC., a California
23 corporation,

24 Defendant.
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Case No. 2:15-cv-01650-SVW-FFM

DISCOVERY MATTER:

**NOTICE OF MOTION AND
MOTION TO COMPEL CJ E&M
INC. TO PRODUCE ADDITIONAL
PORTIONS OF CODE IN
RESPONSE TO RFP NO. 28**

Magistrate: Hon. Frederick Mumm
Date: January 26, 2016
Time: 10:00 a.m.
Crtrm.: 580

Pre-Trial Conference: Feb. 22, 2016
Trial Date: March 1, 2016
Discovery Cut-Off Date: Feb. 1, 2016

1 PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure
2 37, and Local Rule 37-1, on January 26, 2016 at 10:00 a.m., or as soon thereafter as
3 the matter may be heard, before the Honorable Frederick F. Mumm in Courtroom
4 580, of the above-captioned court located at 312 North Spring Street, Los Angeles,
5 California 90012, Plaintiff DFSB Kollektive Co. Ltd. will and hereby does move for
6 an Order to compel defendant CJ E&M Inc. to produce additional portions of code
7 associated with www.mnet.com in response to plaintiff's RFP No. 28. In particular,
8 plaintiff moves to compel CJ E&M Inc. to produce, within two days of the Court's
9 order:

- 10 • The source code for the stored procedure named P_IPCHK_UR_CHK. This
11 includes all versions of code that have been operative, written or modified at
12 any time since March 2012.
- 13 • All databases of IP addresses (and/or IP address ranges) accessed or used in
14 any way by the stored procedure named UP_IPCHK_UR_CHK. This includes
15 all versions of the databases since March 2012.
- 16 • The source code for the website <http://papi.mnet.com/geoip/>. This includes all
17 versions of code that have been operative, written or modified at any time
18 since March 2012.
- 19 • The web server log files for www.mnet.com since March 2012.

20 The Motion is based on this Notice of Motion and Motion, the accompanying
21 Joint Stipulation, the Declaration of Jonathan Gottfried, and exhibits thereto, and on
22 such other and further matters as the Court may consider at or before the hearing on
23 the Motion.

24 Pursuant to Local Rule 37-1 the Joint Stipulation was prepared following the
25 parties' conference of counsel, which initially took place on December 16, 2015.
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1 DATED: January 5, 2016

Keith Wesley
Andrew A. August
Jonathan Gottfried
BROWNE GEORGE ROSS LLP

Bryan K. Sheldon
Lisa J. Yang
LIM. RUGER & KIM. LLP

6 Bv: /s/ Jonathan Gottfried
Jonathan Gottfried
Attorneys for Plaintiff DFSB Kollektive
Co. Ltd.

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 At the time of service, I was over 18 years of age and not a party to this
4 action. I am employed in the County of Los Angeles, State of California. My
business address is 2121 Avenue of the Stars, Suite 2400, Los Angeles, CA 90067.

5 On January 5, 2016, I served true copies of the following document(s)
6 described as **DISCOVERY MATTER: NOTICE OF MOTION AND MOTION**
7 **TO COMPEL CJ E&M INC. TO PRODUCE ADDITIONAL PORTIONS OF**
CODE IN RESPONSE TO RFP NO. 28 on the interested parties in this action as
follows:

8 **SEE ATTACHED SERVICE LIST**

9 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed
10 the document(s) with the Clerk of the Court by using the CM/ECF system.
11 Participants in the case who are registered CM/ECF users will be served by the
CM/ECF system. Participants in the case who are not registered CM/ECF users will
be served by mail or by other means permitted by the court rules.

12 I declare under penalty of perjury under the laws of the United States of
13 America that the foregoing is true and correct and that I am employed in the office
of a member of the bar of this Court at whose direction the service was made.

14 Executed on January 5, 2016, at Los Angeles, California.

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16 /s/ Lynne Burns
17 Lynne Burns
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SERVICE LIST

DFSB KOLLECTIVE, CO. LTD., v. CJ E&M, INC., et al.
USDC Case No. 2:15-cv-01650-SVW-FFM

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